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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

<p>UNITED STATES OF AMERICA,</p>	<p>)</p>	
	<p>)</p>	
<p><i>Plaintiff,</i></p>	<p>)</p>	
	<p>)</p>	
<p>vs.</p>	<p>)</p>	<p>Criminal No. 19-CR-171-ABJ</p>
	<p>)</p>	
<p>MATTHEW “TY” BARRUS,</p>	<p>)</p>	
	<p>)</p>	
<p><i>Defendant.</i></p>	<p>)</p>	

MOTION TO LIFT RESTRAINING ORDER – ECF NO. 5

COMES NOW the Defendant, Matthew “Ty” Barrus, by and through his counsel, Terry J. Harris and Emily M. Harris, of Harris, Harris & Quinn, P.C., and respectfully requests that this Court enter an order lifting the *Post-Indictment Restraining Order* (ECF No. 5) previously entered in this matter. In support, counsel inform the Court as follows:

1. Upon *ex parte* application of the Government, this Court, the Honorable Nancy D. Freudenthal, United States District Judge, on September 26, 2019 entered its *Post-Indictment Restraining Order* (ECF No. 5) restraining Mr. Barrus from attempting or completing any action that would affect the availability, marketability or value of the property identified in said order, including but not limited to selling, transferring, assigning, pledging, distributing, encumbering, wasting, secreting, depreciating, damaging, or in any way diminishing the value of, all or any part of their interest, direct or indirect, in the property identified.

2. Mr. Barrus was acquitted by his jury at the conclusion of his trial in this matter, on March 10, 2022.

3. The Government, through AUSA Eric Heimann, on March 21, 2022, informs this Court Mr. Heimann “agrees that the restraining order should be lifted as to all defendants and all accounts because the defendants were acquitted at trial.” *Government’s Response To Defendant Dutson’s Motion To Release Frozen Assets – ECF Doc. 296*, (ECF No. 304).

WHEREFORE, Defendant Matthew “Ty” Barrus respectfully requests that this Court enter it’s order lifting the *Post-Indictment Restraining Order* (ECF No. 5) previously entered in this matter, and grant such further relief as is appropriate.

Respectfully submitted this 21st day of March, 2022.

s/Terry J. Harris

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the parties, via CM/ECF, this 21st day of March, 2022.

s/Terry J. Harris

Terry J. Harris